Case 08-14631-GMB Doc 1064 Filed 10/08/10 Entered 10/08/10 16:56:12 Desc Main

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October 8, 2010

The Honorable Gloria M. Burns United States Bankruptcy Court Mitchell Cohen Federal Building 401 Market Street 2nd Floor Camden, New Jersey 08102

Re: Shapes/Arch Holdings, LLC
Case No. 08-14631(GMB)
The Class 10 Liquidation Trust
Vs. South Jersey Processing, Inc.
Adv. No. 10-01363(GMB)
Hearing Date: October 18, 2010

Dear Judge Burns:

THOMAS J. ORR

JOHN K. JUSTIN

I represent the Defendant South Jersey Processing, Inc. in Adversary No.10-01363. Please accept this letter in limited opposition to the Motion for an Order Modifying Global Procedures. I reviewed this matter with my client and we do not object to the procedures and timeframes set forth in the Order. However, the Defendant respectfully requests that the place of mediation be within the Camden vicinage where the case was filed. Conducting the mediation in North Jersey or New York City will not be convenient to the Defendant who is located in Camden, New Jersey. The place of mediation is to be fixed by the <u>mediator</u> at a place which is "reasonably convenient for the parties." D.N.J. L.B.R. 9019-2(d)2. Both the debtor and Defendant are located in Camden and the mediation should occur at a location closer then that suggested in the Motion. Thank you.

thomas I.a.

Thomas J. Orr

TJO/hs

Cc: South Jersey Steel Processing, Inc. (Attention: Linda J. McCann)
Cole, Schotz, Meisel, Forman & Leonard, PA (Attention: Ilana Volkov, Esq.)